

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VALEANT
PHARMACEUTICALS INTERNATIONAL; and
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;
ACE INA INSURANCE COMPANY; ALLIANZ
GLOBAL RISKS US INSURANCE COMPANY;
ARCH INSURANCE CANADA LTD; EVEREST
INSURANCE COMPANY OF CANADA;
HARTFORD FIRE INSURANCE COMPANY;
IRONSHORE CANADA LTD.; LIBERTY
INTERNATIONAL UNDERWRITERS, a division
of LIBERTY MUTUAL INSURANCE
COMPANY; and LIBERTY MUTUAL
INSURANCE COMPANY; LLOYD'S
UNDERWRITERS; LLOYD'S CONSORTIUM
9885 (a/k/a STARR FINANCIAL LINES
CONSORTIUM 9885); LLOYD'S SYNDICATE
ANV 1861; LLOYD'S SYNDICATE AMA 1200;
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S
SYNDICATE AWH 2232; LLOYD'S
SYNDICATE BRT 2987; LLOYD'S SYNDICATE
CVS 1919; LLOYD'S SYNDICATE HCC 4141;
LLOYD'S SYNDICATE MITSUI 3210; LLOYD'S
SYNDICATE MIT 3210; LLOYD'S SYNDICATE
NAV 1221; LLOYD'S SYNDICATE QBE 1886;
LLOYD'S SYNDICATE SJC 2003; ROYAL &
SUN ALLIANCE INSURANCE COMPANY OF
CANADA; TEMPLE INSURANCE COMPANY;
and XL INSURANCE COMPANY SE.,

Defendants.

Civil Action No.: 3:18-cv-00493

**STIPULATION SETTING
BRIEFING SCHEDULE AND
ADJOURNING RETURN DATE
OF PLAINTIFFS' PARTIAL
APPEAL OF THE DECEMBER 5,
2019 OPINION AND ORDER OF
SPECIAL MASTER HON.
DOUGLAS K. WOLFSON (RET.)**

STIPULATION AND ORDER

WHEREAS, Plaintiffs Valeant Pharmaceuticals International, Inc., Valeant Pharmaceuticals International, and AGMS, Inc. (collectively, “Plaintiffs”) filed a Partial Appeal of Special Master Hon. Douglas K. Wolfson’s (Ret.) December 5, 2019 Opinion and Order [D.E. 212] on December 20, 2019 [D.E. 213] (“Motion”); and

WHEREAS, Plaintiffs and Defendants have agreed to adjourn the Motion’s return date from January 21, 2020 to February 18, 2020, and have further agreed to the briefing schedule set forth below;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Plaintiffs’ Motion shall be returnable on February 18, 2020.

IT IS FURTHER STIPULATED AND AGREED that the parties shall adhere to the following briefing schedule:

- i. Defendants’ opposition to Plaintiffs’ Motion will be due no later than January 17, 2020; and
- ii. Plaintiffs’ reply in further support of its Motion will be due no later than February 4, 2020.

IT IS SO ORDERED.

HON. LOIS H. GOODMAN, U.S.M.J.

Dated: _____

CONSENTED BY:

McCARTER & ENGLISH, LLP

By: /s/ Sherilyn Pastor

Sherilyn Pastor
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444

-and-

John E. Failla
Nathan Lander
Seth D. Fiur
Om V. Alladi
PROSKAUER ROSE LLP
11 Times Square
New York, NY 10036
(212) 969-3000

*Attorneys for Plaintiffs,
Valeant Pharmaceuticals International, Inc.,
Valeant Pharmaceuticals International, and
AGMS, Inc.*

ARLEO & DONOHUE, LLC.

By: /s/ Frank P. Arleo

Frank P. Arleo
Timothy M. Donohue
Jo Ann K. Dobransky
622 Eagle Rock Avenue
West Orange, NJ 07052
(973) 736-8660

*Attorneys for Defendant,
AIG Insurance Company of Canada*

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

By: /s/ Daniel J. Layden

Daniel J. Layden
Ronald P. Schiller
20 Brace Road - Suite 201
Cherry Hill, NJ 07034
(215) 496-7021

*Attorneys for Defendant/Counterclaim
Plaintiff,
Arch Insurance Canada Ltd.*

BARCLAY DAMON LLP

By: /s/ Jesse R. Dunbar

Jesse R. Dunbar
Kevin D. Szczepanski
1270 Avenue of the Americas - Suite 600
New York, NY 10020
(212) 784-5828

*Attorneys for Defendant/Counterclaim
Plaintiff,
Ironshore Canada Ltd.*

WILFORD CONRAD LLP

By: /s/ Christopher T. Conrad

Christopher T. Conrad
David A. Wilford
Sabina B. Danek
18 East Dundee Road
Building 6 - Suite 150
Barrington, IL 60010
(224) 848-4723

-and-

Melissa J. Brown
Sean Robins
MARKS, O'NEIL, O'BRIEN,
DOHERTY & KELLY, P.C.
Cherry Tree Corporate Center - Suite 501
535 Route 38 East
Cherry Hill, NJ 08002
(856) 663-4300

*Attorneys for Defendants,
Liberty International Underwriters, a division
of Liberty Mutual Insurance Company,
Liberty Mutual Insurance Company, Royal &
Sun Alliance Insurance Company of Canada,
Certain Underwriters at Lloyd's London
subscribing to Policy No. QB078913, Certain
Underwriters at Lloyd's London subscribing
to Policy No. QB146013, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500612, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500642, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500626, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500618, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500629, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500630, Certain
Underwriters at Lloyd's London subscribing
to Policy No. 15G142820113, and Chubb*

SAIBER LLC

By: /s/

Joseph J. Schiavone
Jeffrey S. Leonard
David I. Satine
18 Columbia Turnpike, Suite 200
Florham Park, NJ 07932
(973) 622-3333

*Attorneys for Defendant,
Everest Insurance Company of Canada*

MARKS, O'NEIL, O'BRIEN,
DOHERTY & KELLY, P.C.

By: /s/

Sean X. Kelly
Melissa J. Brown
Sean Robins
Cherry Tree Corporate Center - Suite 501
535 Route 38 East
Cherry Hill, NJ 08002
(856) 663-4300

-and-

Christopher T. Conrad
David A. Wilford
Sabina B. Danek
WILFORD CONRAD LLP
18 East Dundee Road
Building 6 - Suite 150
Barrington, IL 60010
(224) 848-4723

*Attorneys for Defendants,
Liberty International Underwriters, a division
of Liberty Mutual Insurance Company,
Liberty Mutual Insurance Company, Royal &
Sun Alliance Insurance Company of Canada,
Certain Underwriters at Lloyd's London
subscribing to Policy No. QB078913, Certain
Underwriters at Lloyd's London subscribing
to Policy No. QB146013, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500612, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500642, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500626, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500618, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500629, Certain
Underwriters at Lloyd's London subscribing
to Policy No. B0509FINMW1500630, Certain
Underwriters at Lloyd's London subscribing
to Policy No. 15G142820113, and Chubb
Insurance Company of Canada*

SAIBER LLC

By: 

Joseph J. Schiavone
Jeffrey S. Leonard
David I. Satine
18 Columbia Turnpike, Suite 200
Florham Park, NJ 07932
(973) 622-3333

*Attorneys for Defendant,
Everest Insurance Company of Canada*

Insurance Company of Canada

COUGHLIN DUFFY, LLP

By: /s/ Suzanne C. Midlige
Suzanne C. Midlige
Kevin T. Coughlin
350 Mount Kemble Avenue
PO Box 1917
Morristown, NJ 07962
(973) 267-0058

*Attorneys for Defendant,
Allianz Global Risks US Insurance Company*

DLA PIPER LLP

By: /s/ Steven M. Rosato
Steven M. Rosato
John Vukelj
Joseph G. Finnerty III
1251 Avenue of the Americas
New York, NY 10020
(212) 335-4500

*Attorneys for Defendant,
Temple Insurance Company*

SKARZYNSKI BLACK, LLC

By: /s/ Alexis J. Rogoski
Alexis J. Rogoski
Sarah F. Voutyras
1 Battery Park Plaza - 32nd Floor
New York, NY 10040
(212) 820-7735

*Attorneys for Defendant,
Lloyd's Syndicate SJC 2003*

CLYDE & CO. US LLP

By: /s/ Leonard Sarmiento

Leonard Sarmiento
Paul R. Koepff
200 Campus Drive - Suite 300
Florham Park, NJ 07932
(973) 210-6748

-and-

Roderic McLauchlan
Barry Stork
CLYDE & CO.
401 Bay Street #2500
Toronto, ON M5H 2Y4, Canada
(416) 366-4555

*Attorneys for Defendant/Counterclaim
Plaintiff,
Lloyd's Syndicate AWH 2232*